

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

---

The STATE of TEXAS, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN JR., in his official capacity  
as President of the United States, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00780-M

**JOINT STATUS REPORT**  
**REGARDING JURISDICTIONAL DISCOVERY**

Pursuant to the Court's Order of August 22, 2022, ECF No. 50, the parties jointly provide the Court with an update on the status of jurisdictional discovery.

Since the last update to the Court, the parties have continued to confer regarding the written discovery requests exchanged on March 1, 2023. In order to provide some necessary additional time to compile discovery responses and to confer internally regarding the case schedule moving forward and the impact of the recent Federal Register Notice ("FRN") regarding the Central American Minors Program on the claims in this case, the parties have agreed to move their deadline to reciprocally serve their responses and objections to August 15, 2023.

In light of this activity, the parties respectfully request that the Court continue the stay governing this matter and continue to hold all pending deadlines in abeyance. The parties will file a joint status report providing a further update on the progress of jurisdictional discovery on or by August 15, 2023.

Dated: July 17, 2022

Respectfully submitted,

Counsel for Defendants:

BRIAN M. BOYNTON  
*Principal Deputy Assistant Attorney General*

WILLIAM C. PEACHEY  
*Director*  
Office of Immigration Litigation  
District Court Section

EREZ REUVENI  
*Assistant Director*

/s/ Joseph A. Darrow  
JOSEPH A. DARROW  
*Trial Attorney*  
U.S. Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
Tel.: (202) 598-7537  
Joseph.a.darrow@usdoj.gov

Counsel for Defendant-Intervenors:

/s/ Debra J. McComas  
Debra J. McComas  
HAYNES & BOONE LLP  
State Bar No. 00794261  
2323 Victory Ave., Suite 700  
Dallas, Texas 75219  
Tel. (214) 651-5000  
Fax (214) 651-5940  
debbie.mccomas@haynesboone.com

/s/ Linda B. Evarts  
Linda B. Evarts  
NYS Bar #5236948 (*pro hac vice*)  
Kathryn C. Meyer  
NYS Bar #5504485 (*pro hac vice*)  
Mariko Hirose  
NYS Bar #4802674 (*pro hac vice*)  
INTERNATIONAL REFUGEE  
ASSISTANCE PROJECT  
One Battery Park Plaza, 33rd Floor  
New York, NY 10004  
Tel. (516) 838-1655  
Fax: (516) 324-2267  
levarts@refugeerights.org  
kmeyer@refugeerights.org  
mhirose@refugeerights.org

Counsel for Plaintiffs:

GENE P. HAMILTON  
Virginia Bar No. 80434  
Vice-President  
and General Counsel  
America First Legal Foundation  
300 Independence Avenue SE  
Washington, DC 20003  
(202) 964-3721  
gene.hamilton@aflegal.org

ANGELA COLMENERO  
*Provisional Attorney General of Texas*

BRENT WEBSTER  
*First Assistant Attorney General*

GRANT DORFMAN  
*Deputy First Assistant Attorney General*

RALPH MOLINA  
*Deputy Attorney General  
for Legal Strategy*

LEIF A. OLSON  
*Chief, Special Litigation Division*

/s/ Ryan D. Walters  
RYAN D. WALTERS, TX BAR NO. 24105085  
*Deputy Chief, Special Litigation Division*

Office of the Attorney General of Texas  
PO Box 12548 (MC 009)  
Austin, TX 78711-2548  
Phone: (512) 936-2714  
Fax: (512) 457-4410  
Ryan.Walters@oag.texas.gov

*Counsel for Plaintiff State of Texas*

STEVE MARSHALL

Attorney General of Alabama  
Edmund G. LaCour Jr.  
Solicitor General  
Office of the Attorney General  
State of Alabama  
501 Washington Avenue  
P.O. Box 300152  
Montgomery, Alabama 36130-0152  
Telephone: (334) 242-7300  
Fax: (334) 353-8400  
Edmund.LaCour@AlabamaAG.gov  
*Counsel for the State of Alabama*

TREG R. TAYLOR

Attorney General of Alaska  
Cori M. Mills  
Deputy Attorney General  
Christopher A. Robison  
Assistant Attorney General  
Department of Law  
P.O. Box 110300  
Juneau, AK 99811  
Phone: 907-465-3600  
Fax: 907-465-2520  
cori.mills@alaska.gov  
chris.robison@alaska.gov  
*Counsel for the State of Alaska*

TIM GRIFFIN

Attorney General of Arkansas  
Dylan L. Jacobs  
Deputy Solicitor General  
Office of the Arkansas Attorney  
General  
323 Center Street, Suite 200  
Little Rock, Arkansas 72201  
Tel: (501) 682-2007  
Fax: (501) 682-2591  
dylan.jacobs@arkansasag.gov  
*Counsel for the State of Arkansas*

ASHLEY MOODY

Attorney General of Florida  
Natalie P. Christmas  
Counselor to the Attorney General  
Office of the Attorney General  
The Capitol, PL-01  
Tallahassee, Florida 32399-1050  
(850) 414-3300  
(850) 487-2564 (fax)  
natalie.christmas@myfloridalegal.com  
*Counsel for the State of Florida*

RAÚL LABRADOR

Attorney General of Idaho  
Alan W. Foutz  
Deputy Attorney General  
Lincoln Davis Wilson  
Chief, Civil and Constitutional Defense  
Division  
P.O. Box 83720  
Boise, ID 83720-0010  
Telephone: (208) 334-2400  
FAX: (208) 854-80731  
Alan.foutz@ag.idaho.gov  
lincoln.wilson@ag.idaho.gov  
*Counsel for the State of Idaho*

THEODORE E. ROKITA

Attorney General of Indiana  
Betsy M. DeNardi  
Director of Complex Litigation  
Cory C. Voight  
Assistant Chief Deputy  
Indiana Government Center South  
302 W. Washington St., 5th Floor  
Indianapolis, IN 46204  
Betsy.DeNardi@atg.in.gov  
Cory.Voight@atg.in.gov  
*Counsel for the State of Indiana*

DANIEL CAMERON

Attorney General of Kentucky  
Jeremy J. Sylvester  
Assistant Attorney General  
Kentucky Office of the Attorney  
General  
700 Capital Avenue, Suite 118  
Frankfort, Kentucky  
Tel: (502) 696-5330  
Jeremy.Sylvester@ky.gov  
*Counsel for the Commonwealth of Kentucky*

JEFF LANDRY

Attorney General of Louisiana  
Elizabeth B. Murrill  
Solicitor General  
J. Scott St. John  
Deputy Solicitor General  
Louisiana Department of Justice  
1885 N. Third Street  
Baton Rouge, LA 70804  
Tel: (225) 326-6766  
murrille@ag.louisiana.gov  
stjohnj@ag.louisiana.gov  
*Counsel for the State of Louisiana*

ANDREW BAILEY

Attorney General of Missouri  
Joshua M. Divine  
Solicitor General  
Samuel C. Freedlund  
Assistant Attorney General for Special  
Litigation  
Missouri Attorney General's Office  
Post Office Box 899  
Jefferson City, MO 65102  
Tel: (573) 751-8870  
Fax: (573) 751-0774  
samuel.freedlund@ago.mo.gov  
*Counsel for the State of Missouri*

AUSTIN KNUDSEN

Attorney General of Montana  
Christian B. Corrigan  
Solicitor General  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401  
Phone: 406-444-2026  
Fax: 406-444-3549  
christian.corrigan@mt.gov  
*Counsel for the State of Montana*

GENTNER F. DRUMMOND

Attorney General of Oklahoma  
Zach West  
Director of Special Litigation  
Office of the Oklahoma Attorney  
General  
313 NE 21st St.  
Oklahoma City, OK 73105  
(405) 521-3921  
zach.west@oag.ok.gov  
*Counsel for the State of Oklahoma*

ALAN WILSON

Attorney General of South Carolina  
Thomas T. Hydrick  
Assistant Deputy Solicitor General  
Post Office Box 11549  
Columbia, SC 29211  
Phone: (803) 734-4127  
Email: thomashydrick@scag.gov  
*Counsel for the State of South Carolina*

SEAN D. REYES

Utah Attorney General  
Melissa A. Holyoak  
Utah Solicitor General  
Office of the Utah Attorney General  
350 N. State Street, Suite 230  
Salt Lake City, UT 84114  
Email: melissaholyoak@agutah.gov  
*Counsel for the State of Utah*

**Certificate of Service**

On July 17, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Joseph A. Darrow  
JOSEPH A. DARROW  
U.S. Department of Justice